

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ASTRALABS, INC.

Plaintiff,

v.

MICAH FRIEDLAND,

Defendant.

Case No. 2:22-cv-06507-JMV-JSA

**DEFENDANT'S MOTION TO
EXTEND TIME TO ANSWER OR
RESPOND**

Defendant Micah Friedland respectfully moves this Honorable Court for an order extending his time to answer or otherwise respond to the Complaint. In support thereof, Defendant states:

1. On November 7, 2022, a Complaint was filed in this action.
2. On November 9, 2022, I accepted service of the Complaint without Summons.
3. On November 30, 2022, I accepted service of the Complaint and Summons. In light of service, I understand that my time to answer or otherwise reply to the Complaint expires on December 21, 2022.
4. I am a natural person and have thus far represented myself *pro se*, but am now in the process of retaining legal counsel for this matter.
5. I require an extension in order to find and retain counsel, for counsel to review the Complaint, and for my counsel and I to adequately prepare a response.
6. On December 8, 2022, I communicated to Plaintiff's attorneys my plans to retain counsel and requested that Plaintiff stipulate to an extension. Plaintiff refused and accordingly opposes this motion.

7. I attest that this motion is made in good faith and not for the purpose of delay.
8. No previous extension has been sought or granted in this action.

WHEREFORE, Defendant Micah Friedland respectfully requests that the Court grant this motion and extend the time for Defendant to answer or otherwise respond to the Complaint until **January 20, 2023**.

Dated: December 9, 2022

Respectfully submitted,

/s/ Micah Friedland
Micah Friedland
220 Park Ave, Passaic, NJ, 07055
310-948-2255
Micah.Friedland@gmail.com

ASTRALABS, INC.

Plaintiff,

Case No. 2:22-cv-06507-JMV-JSA

v.

MICAH FRIEDLAND,

Defendant.

PROPOSED ORDER ON MOTION TO EXTEND TIME TO ANSWER

AND NOW, this ____ day of _____, upon consideration of Defendant Micah Friedland's Motion to Extend Time to Answer to Plaintiff's Complaint, it is hereby ORDERED that said motion is GRANTED, and Defendant shall respond to Plaintiff's Complaint on or before January 20, 2023.

BY THE COURT

CERTIFICATE OF SERVICE

This is to certify that on December , 2022, I electronically transmitted this document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the counsel of record.

/s/ *Micah Friedland*

Micah Friedland

NOTE: Only include this page if you submit via the Electronic Filing System.